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November 3, 2021

U.S. Department of Transportation, Docket Operations  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Amendment to Exemption No. 18908, Petition for Exemption to Conduct Unmanned Aircraft Systems (UAS) Operations Allowed by Special authority for certain unmanned aircraft systems. Title 49 U.S.C. § 44807, and 14 C.F.R. Part 11 to Authorize Commercial Agricultural- Related Services with UAS Weighing 55 Pounds or More**

#### **A. SUMMARY:**

On behalf of our client, Land Services Company, an agricultural services company (hereafter known as Land Services Company), and pursuant to Title 49 U.S.C. § 44807, Special authority for certain unmanned aircraft systems and 14 C.F.R. Part 11, Land Services Company hereby respectfully requests to amend their Petition for Exemption to add the DJI AGRAS T-30 unmanned aircraft systems ("UAS") weighing over 55 pounds but no more than 142 lbs. maximum spray weight and 172 lbs. maximum spreading weight, for agricultural operations and vegetation control. The operations will be conducted within and under the conditions outlined herein, or as may be established by the FAA, as required by Title 49 U.S.C. § 44807.

Currently, Land Services Company has an approved Petition for Exemption for the DJI Agras T-20, for agricultural aircraft operations, Exemption No. 18908. Land Services Company's Training Manual and safety manuals have already been submitted. An updated Flight Operations and Procedures Manual (FOPM) is included with this amendment.

In this particular amendment, the requested exemption would permit the operation of no more than three (3) DJI AGRAS T-30s by petitioner or a combination of T-20s and T-30s

of no more than three (3) under controlled conditions in predetermined airspace that is, 1) Limited in scope 2) Controlled as to access by mission essential personnel only. Grant of the requested exemption is based upon the concise direction expressed within Title 49 U.S.C. § 44807; the added authority granted by the Act, as amended; an equivalent level of safety regarding flight operations as expressed herein, and significant cost savings achieved by transitioning from traditional manned aerial resources to UASs. The petitioner respectfully requests that the FAA grant the requested exemption without delay. Petitioner will operate the DJI AGRAS T-30 while keeping the documents required by the regulations at the ground control station and immediately accessible to the Pilot in Command (PIC) and by modification of the required markings (registration number) of the UAS to be displayed on the fuselage.

The name and address of the Petitioner is:

Land Services Company, Inc.

The primary contact for this petition, with a copy to me at the address above is:

98 Centermarsh Lane,  
Pawleys Island, SC 29585  
Attn: Tom Rowland

In support of this Petition for Exemption, Land Services Company will submit the following associated UAS operating documents:

- Land Services Safety Case multiple aircraft
- Land Services Safety Case within 500 feet
- Land Services FOPM
- DJI Agras T-30 Quick Start Guide
- DJI AGRAS T-30 Operating Manual
- DJI AGRAS T-30 Intelligent Battery Station Manual
- DJI AGRAS T-30 Entrustment Inspection and Testing Report, Translated
- DJI AGRAS T-30 TCB grant of Equipment Authorization National Information Infrastructure
- DJI AGRAS T-30 TCB grant of Equipment Authorization Digital Transmission System
- DJI Agras Additional Information

All of these documents will be submitted on a confidential basis under separate cover, pursuant to 14 C.F.R. § 11.35(b), as the documents contain confidential commercial and proprietary information that Land Services Company has not and will not share with others. The information contained in this material is not generally available to the public and is protected from release under the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*

## **B. BACKGROUND OF PETITIONER AND MANUFACTURER**

Land Services Company, LLC is a diversified provider of agricultural services for a wide variety of Government and commercial clients throughout the US. Land Services Company is utilizing their experience in agriculture to expand into missions well suited for over 55 lb. UAS/drones to reduce risk and improve efficiencies and value added. Land Services Company plans to provide a wide array of services in agricultural markets where UAS/drones fit the mission better and safer than manned aircraft. The major benefits to the general public are 1) reduction in injury to ground based applicators in challenging terrain, 2) reduced exposure to chemicals for applicators, 3) reduction in chemical drift compared to manned aircraft application, 4) reduced risk

to flight crew compared to manned aircraft, 5) reduced exposure of surrounding beneficial vegetation, 6) more environmentally friendly application with reduced noise, 7) selective use of chemicals for a safer more targeted application, and 8) better value for the customer.

The UAS for the purposes of this petition is the DJI AGRAS T-30.

DJI has an unparalleled presence in the UAS market with steadfast commitment to R&D, a culture of constant innovation and curiosity, and a focus on transforming complex technology into easy-to-use devices. Building on the ethos of “form follows function,” DJI products combine advanced technology with dynamic designs.

Established to produce DJI's innovative products safely and responsibly, the wholly owned subsidiary Shenzhen Dajiang Baiwang Technology Co., Ltd. is a high-tech manufacturing facility specializing in unmanned aerial vehicles.

In 2016, Dajiang Baiwang passed the ISO 9001:2015 Quality Management System Certification and in 2017 passed the SGS ISO 14001:2015 Environmental Management System Certification.

DJI's offices can now be found in the United States, Germany, the Netherlands, Japan, South Korea, Beijing, Shanghai, and Hong Kong. As a privately owned and operated company, DJI focuses on its vision, supporting creative, commercial, and nonprofit applications of their technology.

Today, DJI products are redefining industries. Professionals in filmmaking, agriculture, conservation, search and rescue, energy infrastructure, and more customers trust DJI to bring new perspectives to their work and help them accomplish feats safer, faster, and with greater efficiency than ever before.

Sales of the DJI Agras T-30 have occurred in China, Southeast Asia, and Korea for over six months with a combined total of 1,200,000 hours flown and 20,600.000 flights without any recorded incidents.

#### **C. DJI AGRAS T-30 SAFETY FEATURES AND SPECIFICATION.**

Enhanced safety features, inspections, testing data and specifications of the T-30 are included in the attached proprietary documents. Land Services Company requests an exemption for the purpose of operating Unmanned Aircraft Systems (UAS) weighing 55 pounds or more, but no more than 142 lbs maximum spray weight and 172 lbs maximum spreading weight, to provide commercial agricultural-related services in the United States.

#### **D. CONCLUSION**

For the foregoing reasons, Land Services Company respectfully requests that the FAA grant this amendment to add the DJI Agras T-30 and grant multiple aircraft operations with the T-20 and T-30. Should you have any questions, or if you need additional information to support Land Services Company Petition, please do not hesitate to contact the undersigned.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kelly J. Neubecker", with a stylized flourish at the end.

Kelly J. Neubecker

CEO

UASolutions Group, Inc.

Cc. Tom Rowland